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Via ECF

The Honorable Judge Barbara C. Moses
United States District Court
Southern District of New York
500 Centre Street
New York, New York 10007

MEMO ENDORSED

Re: Clemente, et al. v. Midtown East LLC, et al.
19-CV-2647 (BCM)

Dear Judge Moses:

We represent the Plaintiffs in the above-referenced matter and we submit this letter motion to respectfully request a one-week extension to file the parties' motion for settlement approval and settlement agreement. The parties are to file the aforementioned settlement documents by today, September 10, 2020. If this request is granted, the settlement documents can be filed by September 17, 2020. This is the first request for an extension to file the settlement documents.

The parties have finalized all of the settlement documents, however, our office is still in the process of obtaining our clients' signatures – a process that has become more difficult with the current Covid restrictions. Our office anticipated obtaining all Plaintiffs' signatures today, but two of the Plaintiffs will not be able to come to our office to sign the agreement today as scheduled. As such, we request this brief extension in order to obtain the outstanding signatures so that the fully executed agreement can be promptly submitted to the Court. Defendants' counsel has consented to this request.

We thank the Court for its consideration on this matter and remain available to provide any additional information.

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J.
September 18, 2020

Respectfully submitted,

Roman Avshalumov, Esq.